

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA,	:	Civil No. 1:19CV392
Plaintiff,	:	
	:	
v.	:	
	:	
\$40,200.00 in U.S. CURRENCY,	:	
	:	
and	:	
	:	
\$40,080.00 in U.S. CURRENCY,	:	
	:	
and	:	
	:	
\$40,344.00 in U.S. CURRENCY,	:	
Defendants.	:	

VERIFIED COMPLAINT OF FORFEITURE

NOW COMES Plaintiff, the United States of America, by and through Matthew G.T. Martin, United States Attorney for the Middle District of North Carolina, and respectfully states as follows:

1. This is a civil action *in rem* brought to enforce the provisions of 21 U.S.C. § 881(a)(6) for the forfeiture of the defendant properties, which were furnished or intended to be furnished in exchange for a controlled substance, in violation of Title II of the Controlled Substances Act, 21 U.S.C. §§ 801 *et seq.*, or represent proceeds traceable to such an exchange, or were used or intended to be used to facilitate violation of the Controlled Substances Act.

2. This action is also brought to enforce the provisions of 18 U.S.C. § 981(a)(1)(C) for the forfeiture of the aforesaid defendant properties which constitute or were derived from proceeds traceable to an offense constituting specified unlawful activity as defined in 18 U.S.C. § 1956(c)(7), or a conspiracy to commit such offense, specifically the exchange of a controlled substance in violation of state or federal law.

3. The defendant properties are \$40,200.00 in U.S. Currency, \$40,080.00 in U.S. Currency, and \$40,344.00 in U.S. Currency, which were seized on February 21, 2019, in Greensboro, North Carolina, and have been deposited to the United States Postal Service Forfeiture Holding Fund.

4. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant properties. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

5. Venue is proper in this district pursuant to 28 U.S.C. §§ 1355(b)(1) and 1395, because the defendant properties were seized while located in the jurisdiction of this Court, or one or more of the acts giving rise to forfeiture occurred in this district.

6. Upon the filing of this complaint, Plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which Plaintiff will execute upon the properties pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

7. The facts and circumstances supporting the seizure and forfeiture of the defendant properties are contained in Exhibit A, attached hereto and wholly incorporated herein by reference.

WHEREFORE, the United States of America prays that process of a Warrant for Arrest and Notice *In Rem* be issued for the arrest of the defendant properties; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant properties be forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Date: April 10, 2019

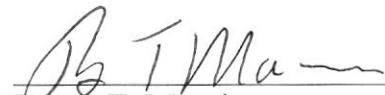
Respectfully submitted,

MATTHEW G.T. MARTIN
United States Attorney

/s/ Nathan L. Strup
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VERIFICATION

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury under the laws of the United States of America, that the contents of the foregoing Complaint are true and correct to the best of my knowledge, information and belief.



Roger T. Marvin
Special Agent
US Postal Service – Office of Inspector General

DECLARATION

I, Roger T. Marvin, pursuant to 28 U.S.C. § 1746, under penalty of perjury and pursuant to the laws of the United States, state that the following is true and correct to the best of my knowledge and belief:

1. I am currently employed as a Special Agent with the United States Postal Service Office of Inspector General, (USPS-OIG), assigned to the Capital Metro Area Field Office. I have been employed by the USPS-OIG since May of 2004. I am a sworn federal law enforcement officer, empowered to investigate criminal activity involving or relating to the United States Postal Service (Postal Service) and/or United States mail.

2. Prior to my employment with USPS-OIG, I was employed by the Virginia State Police, serving eight years as a trooper and two years as a special agent in the Bureau of Criminal Investigation. I have made numerous arrests for drug offenses and other crimes and testified in many state and federal courts. I graduated from the State University of New York at Plattsburgh in 1990. I attended a weeklong USPS-OIG narcotics training program focused on narcotics parcel investigations in April 2018.

3. I am currently assigned to a multi-functional team which investigates crimes committed by employees of the Postal Service, including, but not limited to, mail theft, financial fraud and embezzlement, transportation of controlled substances or proceeds through the United States mail, and other crimes against or involving the United States mail.

4. This Declaration is submitted in support of a Verified Complaint of Forfeiture of a total of \$120,624.00 in United States Currency seized on February 21, 2019,



from three parcels (tracking #s 9505514155279009322794, 9505514155279009322800, and 9505516160129009251975).

5. As set forth below, this Declaration concerns an investigation into the use of the United States mail to deliver controlled substances and cash proceeds of unlawful drug transactions. The investigation has revealed a substantial amount of Postal Service parcels were being used to facilitate the transportation and distribution of marijuana from the San Jose, CA area to the Charlotte/Kannapolis, NC area, and the transportation of U.S. Currency from the Charlotte/Kannapolis area to the San Jose, CA area. My statements are based upon my personal observations, review of law enforcement and postal records, and information relayed to me by other law enforcement agents or citizen witnesses whom I believe to be reliable.

6. One of my duties is to review Postal Service data to detect suspicious activity indicative of Postal Service employees facilitating the transportation of controlled substances or proceeds of unlawful drug transactions through the mail. One indication of such activity is an employee with a significantly larger than usual number of Priority Mail and Priority Mail Express parcels sent to multiple addresses on their assigned route and originating in states known to be sources of controlled substances. Based on my training and in my experience, drug traffickers often use the Priority Mail Express service, which is the USPS overnight/next day delivery product, or the Priority Mail service, which is typically a 2-3-day delivery product, in part because of the speed and reliability of these delivery services, and the traffickers' ability to track the article's movement to the intended delivery point.

7. I know from my experience and training that drug traffickers often use fictitious or incomplete names and addresses in an effort to conceal their identity from law enforcement officers when mailing illegal drugs and proceeds of their transactions.

8. I initiated the investigation described below after Postal Service data showed that a large number of Priority Mail parcels originating in the San Jose, CA area had been sent to several different addresses on a single route in Kannapolis, NC. Surveillance of the letter carrier assigned to that route revealed that instead of being delivered as addressed, parcels were diverted to an individual in exchange for cash. I seized four parcels originating in the San Jose, CA area during this investigation. I executed search warrants on two of them in the Western District of North Carolina and found a total of approximately 7.5 pounds of suspected marijuana. I executed search warrants on the other two in the Middle District of North Carolina and also found a total of approximately 7.5 pounds of suspected marijuana. I also recovered three parcels previously mentioned in paragraph 4 above, which contained U.S. Currency and were mailed to addresses in the San Jose, CA area. These parcels are in the USPS-OIG evidence storage room in Greensboro, NC. Some, but not all, of the facts of the investigation are summarized below.

9. In June 2018, I noticed a disproportionate amount of Priority Mail parcels originating in the San Jose, CA area had been scanned delivered in Kannapolis, NC, by a particular City Letter Carrier (CARRIER # 1). Postal Service data showed that during the period from May 1, 2018, through June 30, 2018, thirty-seven Priority Mail parcels scanned as "DELIVERED" in Kannapolis had been accepted for shipping at retail counters in San Jose, CA area Post Offices. CARRIER # 1 delivered 26 of the parcels and a particular

Carrier Technician (CARRIER # 2) delivered 9 of them. The 35 packages delivered by CARRIER # 1 and CARRIER # 2 were addressed to 19 different addresses on City Route 14, which is one of thirty-five delivery routes in Kannapolis. Each parcel had a postage amount of \$18.90, which is the amount of a large Flat Rate Priority Mail box, and weighed between 3.94 and 5.19 pounds.

10. CARRIER # 1 is a city letter carrier in Kannapolis, assigned to a fixed route. He was assigned to City Route 14 until September 29, 2018, when he was assigned to City Route 11.

11. CARRIER # 2 is a carrier technician and serves as the regular substitute carrier for multiple routes in Kannapolis.

12. Colbey Lamont Black (BLACK) is 29 years old and frequents Concord, NC. His current address is unknown, but he is associated with Black's Transport, a courier business located in Concord. BLACK has been convicted of several felonies, including possession of marijuana with intent to distribute, possession of cocaine with intent to distribute, felony possession of a schedule II controlled substance, felony possession of cocaine, and felony possession of marijuana.

13. I reviewed images of several of the parcels described in paragraph 9 above, sent from the San Jose, CA area and delivered by CARRIER # 1 and CARRIER # 2. Many of the address labels were handwritten and the parcels had been sent in retail transactions in which only the one parcel was mailed and payment was made by cash.

14. In August 2018, I began to conduct video surveillance of CARRIER # 1 and CARRIER # 2. By December 17, 2018, I obtained surveillance video for 21 days during

which CARRIER # 1 or CARRIER # 2 handled a total of 61 large Flat Rate Priority Mail parcels originating in the San Jose, CA area. None of the parcels were delivered as addressed and instead were diverted in exchange for cash. Some examples are described below.

15. On August 23, 2018, CARRIER # 1 worked on City Route 14 and scanned as "DELIVERED" five Priority Mail parcels originating in the San Jose, CA area, each bearing \$18.90 in postage. Postal Service data showed that these were the only parcels bearing \$18.90 in postage scanned by CARRIER # 1 on that day. CARRIER # 1 did not deliver the packages at the time or location that he scanned them. Later that day, CARRIER # 1 gave BLACK five large Flat Rate Priority Mail boxes, and BLACK gave CARRIER # 1 an unknown amount of cash.

16. On August 29, 2018, CARRIER # 1 worked on City Route 14 and scanned as "DELIVERED" three Priority Mail parcels originating in the San Jose, CA area, each bearing \$18.90 in postage. Postal Service data showed that these were the only parcels bearing \$18.90 in postage scanned by CARRIER # 1 on that day. CARRIER # 1 did not deliver the packages at the time or location that he scanned them. Later that day, CARRIER # 1 met with an unknown person in a white car. CARRIER # 1 put three large Flat Rate Priority Mail boxes in the front passenger side of the white car. The unknown person handed CARRIER # 1 an unknown amount of cash.

17. On September 7, 2018, CARRIER # 1 worked on City Route 14 and scanned as "DELIVERED" three Priority Mail parcels originating in the San Jose, CA area, each bearing \$18.90 in postage. Postal Service data showed that these were the only parcels

bearing \$18.90 in postage scanned by CARRIER # 1 on that day. CARRIER # 1 did not deliver the packages at the time or location that he scanned it. Later that day, CARRIER # 1 gave BLACK three large Flat Rate Priority Mail boxes and BLACK gave CARRIER # 1 an unknown amount of cash.

18. On September 15, 2018, CARRIER # 1 worked on City Route 14 and scanned as "DELIVERED" three Priority Mail parcels originating in the San Jose, CA area, each bearing \$18.90 in postage. Postal Service data showed that these were the only parcels bearing \$18.90 in postage scanned by CARRIER # 1 on that day. CARRIER # 1 did not deliver the packages at the time or location that he scanned them. Later that day, CARRIER # 1 gave BLACK the three parcels, and BLACK gave CARRIER # 1 an unknown amount of cash.

19. Effective September 29, 2018, CARRIER # 1 was reassigned from City Route 14 to City Route 11 in Kannapolis, NC, 28083. Postal Service data shows that during the period from January 29, 2018, through September 29, 2018, there were 117 parcels originating in the San Jose, CA area, each bearing \$18.90 in postage and destined for City Route 14. There were no parcels meeting this profile destined for City Route 11 during this period. Two of these parcels were destined for City Route 14 in October. There were no similar parcels sent to City Route 14 in November. Postal Service data show that no parcel originating in the San Jose, CA area bearing \$18.90 in postage was sent to City Route 11 in 2018 prior to October 1, 2018. In October and November, 2018, there were 46 of these parcels sent to City Route 11.

20. On October 15, 2018, CARRIER # 1 worked on City Route 11 and scanned as “DELIVERED” four Priority Mail parcels originating in the San Jose, CA area, each bearing \$18.90 in postage. CARRIER # 1 did not deliver the parcels when he scanned them. Later that day, CARRIER # 1 gave BLACK four large Flat Rate Priority Mail boxes, and BLACK gave CARRIER # 1 an unknown amount of cash.

21. On October 29, 2018, CARRIER # 2 worked on City Route 11 and scanned as “DELIVERED” four Priority Mail parcels originating in the San Jose, CA area, each bearing \$18.90 in postage. Postal Service data showed that these were the only parcels bearing \$18.90 in postage scanned by CARRIER # 2 on that day. CARRIER # 2 did not deliver the parcels when he scanned them. Later that day, CARRIER # 2 and BLACK met in a parking lot. CARRIER # 2 exited his postal vehicle and the back door of the postal vehicle opened. BLACK opened the driver’s side rear door of his vehicle, and at least one white object was placed in his vehicle.

22. On November 1, 2018, CARRIER # 1 worked on City Route 11 and scanned as “DELIVERED” two parcels originating in the San Jose, CA area, each bearing \$18.90 in postage. CARRIER # 1 did not deliver the parcels when he scanned them. Later that day, CARRIER # 1 gave BLACK two large Flat Rate Priority Mail boxes, and BLACK gave CARRIER # 1 an unknown amount of cash.

23. On November 26, 2018, CARRIER # 1 worked on City Route 11 and scanned as “DELIVERED” three parcels originating in the San Jose, CA area, each bearing \$18.90 in postage. Postal Service data showed that these were the only parcels bearing \$18.90 in postage scanned by CARRIER # 1 on that day. CARRIER # 1 did not deliver the

parcels when he scanned them. Later that day, CARRIER # 1 gave BLACK three large Flat Rate Priority Mail boxes, and BLACK gave CARRIER # 1 an unknown amount of cash.

24. On January 7, 2019, CARRIER # 1 worked on City Route 11 and scanned as "DELIVERED" two parcels originating in the San Jose, CA area, each bearing \$18.90 in postage. CARRIER # 1 also handled a third parcel bearing \$18.90 in postage and originating in the San Jose, CA area, but never scanned it as "DELIVERED". Later that day, CARRIER # 1 gave BLACK three large Flat Rate Priority Mail boxes, and BLACK gave CARRIER # 1 an unknown amount of cash.

25. On January 7, 2019, I obtained and executed a search warrant on a Flat Rate Priority Mail parcel bearing tracking # 9505511464038337239617 and mailed to an address in Concord, NC. The parcel had been sent from the San Jose, CA area using a particular sender name that had previously appeared on several parcels, described above, sent to addresses on City Route 14 in Kannapolis and known to have been diverted to BLACK by CARRIER # 1. Research showed that the names listed as the sender and recipient were not associated with the addresses listed on the parcel, and that the return address was not legitimate. The parcel contained two double-bagged vacuum-sealed bags of plant material consistent with marijuana.

26. On January 7, 2019, three large Flat Rate Priority Mail parcels mailed to addresses on City Route 11, using sender names that had previously appeared on parcels known to have been diverted to BLACK by CARRIER # 1, were accepted in the San Jose, CA area in three separate cash transactions.

27. On January 9, 2019, I obtained and executed a search warrant and tracking warrant on one of the Flat Rate Priority Mail parcels described in paragraph 26, bearing tracking # 9505511464019007252112 (TRACKED PARCEL). The TRACKED PARCEL contained three sealed plastic bags with a combined weight of approximately 3.6 pounds containing plant material consistent with marijuana. A global positioning satellite tracking device was put in the TRACKED PARCEL pursuant to the tracking warrant, and it was returned to the Postal Service for delivery along with the two other parcels described in paragraph 26 above.

28. On January 10, 2019, I monitored CARRIER # 1 and the delivery of the TRACKED PARCEL and the two other parcels on City Route 11. CARRIER # 1 scanned each of the parcels as "DELIVERED, FRONT DOOR/PORCH". CARRIER # 1 subsequently scanned the TRACKED PARCEL as "DELIVERY DELAY". CARRIER # 1 then scanned the second parcel as "RETURN TO POST OFFICE FOR ADDRESS VERIFICATION". There were no changes to the status of the third parcel. CARRIER # 1 then brought all three parcels back to the Kannapolis Post Office.

29. CARRIER # 1 was interviewed at the end of his shift on the same day. He stated that he had been diverting parcels to BLACK in exchange for a fee of \$150 per box and that he assumed the boxes contained marijuana. CARRIER # 1 said that BLACK wanted him to bring the three parcels described in paragraph 26 to BLACK, and that CARRIER # 1 refused to do so because CARRIER # 1 knew he was being watched. CARRIER # 1 said he had been involved in this arrangement with BLACK for approximately two and a half years.

30. On January 14, 2019, I interviewed CARRIER # 2 and he admitted to diverting parcels to BLACK in exchange for cash for several months. He said that CARRIER # 1 introduced him to BLACK.

31. With respect to each of the parcels described in paragraphs 13-28 above, I determined that the sender name was either fictitious or not associated with the return address, the return address was either fictitious or not associated with the sender name, the recipient name was not associated with the delivery address, and the delivery address was an actual delivery address on a City Route assigned to Carrier # 1 or Carrier # 2.

32. From November 2018 to February 2019, I researched Priority Mail parcels sent to the San Jose, CA area (three-digit Zip Codes "950" and "951") from the Charlotte/Kannapolis area (three-digit Zip Codes "280", "281" and "282") during the period from January 2017 through January 12, 2019. I identified 184 Flat Rate Priority Mail parcels accepted during this time period through Postal Service retail units or self-service kiosks in the Charlotte/Kannapolis area, and sent to four addresses in the San Jose, CA area.

33. Images were available for 46 of the 184 Priority Mail parcels that I identified. After researching public records searches and conducting interviews, I determined that none of the sender names were associated with the return addresses listed on the 46 parcels of which I had images.

34. I also determined that one of the four delivery addresses in the San Jose, CA area to which the 46 parcels were sent was associated with Sabine Thaller (S. THALLER), one was associated with both S. THALLER and Michael Thaller (M. THALLER), one was

associated with M. THALLER and Joseph B. Psick (PSICK), and one was associated with PSICK.

35. Of the 46 parcels of which I had images, 2 parcels were sent to “Jennifer Thaller” at a San Jose, CA area address that is associated with S. THALLER and M. THALLER. The sender name on the parcels used was “Orlando Brooks” and the return address was an address in Kingstown, NC. Records show that Orlando Whisnant (WHISNANT) is associated with that address in Kingstown, and that no “Orlando Brooks” is associated with that address.

36. Postal Service data show that from October 2017 through July 2018, twenty-two large Flat Rate Priority Mail parcels weighing 4.19 to 5.12 pounds were mailed from the San Jose, CA area to four separate addresses on the same road in Kingstown as the delivery address referenced in paragraph 35 above. These included 4 parcels mailed to the address associated with WHISNANT. No images of these parcels were available.

37. Records show that WHISNANT is associated with two other addresses, in Charlotte, NC, to which 15 parcels weighing between 4.19 and 4.56 pounds were sent from the San Jose, CA area from October 2017 to May 2018. I reviewed images of 3 of the parcels that were available. The sender names used on these 3 parcels had previously appeared on parcels known to have been diverted to BLACK by CARRIER # 1 and CARRIER # 2. The recipient names used on the parcels were “Carlton Brooks” and “Otis Whisnant”. A public records search indicated that those names were not associated with the respective delivery addresses.

38. I also identified 94 large Flat Rate Priority Mail parcels that were sent from February 10, 2017, to May 14, 2018, from the San Jose, CA area to a particular company and address in Locust, NC, that are associated with Joseph Daniel Smith (SMITH). Images were available for 4 of the 94 Priority Mail parcels. All 4 parcels used a particular sender name and return address that had previously appeared on several parcels, described above, sent to addresses on City Route 14 in Kannapolis and known to have been diverted to BLACK by CARRIER # 1. Each parcel weighed between 4.12 and 5.31 pounds. These parcels were all accepted in retail transactions paid by cash.

39. I identified 55 large Flat Rate Priority Mail parcels sent from January 6, 2017, to August 31, 2017, each weighing between 3.94 and 5.31 pounds. Each parcel originated in the San Jose, CA area and was sent a particular address in Concord, NC, that is associated with SMITH. These parcels were all accepted in retail transactions paid by cash.

40. In 2015 – 2017, SMITH transferred three real properties located in Cabarrus County, NC, to M. THALLER. The deed instruments give mailing addresses for M. THALLER in the San Jose, CA area. M. THALLER was fingerprinted in 2018 as an applicant for cannabis activity license.

41. In 2017, BLACK transferred two real properties located in Cabarrus County, NC, to S. THALLER. Both deed instruments give a mailing address for S. THALLER in the San Jose, CA area.

42. Kahlil J. Marsh (MARSH) works with BLACK as a driver for Black's Transport. Postal Service data show that in 2017 and 2018, twelve large Flat Rate Priority Mail parcels weighing 4.12 to 5.19 pounds were mailed from the San Jose, CA area to three

addresses in Concord associated with MARSH. I reviewed images that were available for five of the parcels, four of which used sender names that had previously appeared on parcels known to have been diverted to BLACK by CARRIER # 1.

43. On November 8, 2018, MARSH mailed a Priority Mail parcel to a San Jose, CA area address that is associated with M. THALLER and S. THALLER from a Post Office in Concord. No image of the parcel was available and Post Service records do not show it was delivered.

44. I found records of 36 parcels originating in the Charlotte/Kannapolis area addressed to a particular address in the San Jose, CA area from February 2017 to October 2018. An image of one of the parcels was available. That parcel was mailed at Steele Creek Station Post Office in Charlotte, NC, on October 25, 2018, and purported to be from "D&G Graphic Tee's" with a Fallston, NC PO Box listed as the return address. I found no record of such a company in North Carolina. The PO Box listed is registered to an individual third party who has no known connection to "D&G Graphic Tee's" or to the investigation. The parcel was sent to "Amber Stevens" at an address in the San Jose, CA area that records show was associated with M. THALLER from 2017, and PSICK from 2017 to 2018. Research showed that no "Amber Stevens" has been associated with the address.

45. I found records of 82 parcels originating in the Charlotte/Kannapolis area sent to another address in the San Jose, CA area from February 2017 to January 2019. Images were available of 19 of these parcels. Those 19 parcels were variously sent to 7 different named individuals, including a "Sabine Moraga", none of which have been associated with the delivery address. Records show that since 2015, several individuals,

none of whom were named on the 19 parcels, have been associated with the delivery address, including M. THALLER and S. THALLER.

46. I found records of 34 parcels originating in the Charlotte/Kannapolis area sent to another address in the San Jose, CA area from November 2017 to January 2019. Images were available for 9 of the parcels. They were all addressed to "Michael Pomposo". Research shows no record of a "Michael Pomposo" in California. Records show that two individuals with the surname "Pomposo" have been associated with the delivery address since 1987, and that S. THALLER was associated with the address from 1987-2007.

47. I found records of 32 parcels originating in the Charlotte/Kannapolis, NC area sent to another address in the San Jose, CA area from May 2018 to January 2019. Images were available for 17 of the parcels. Two of the parcels were addressed to "Joseph Psick" and 15 were addressed to "Joseph Maria". Research identified several individuals associated with the address, including PSICK and PSICK's mother, whose surname is "Maria". PSICK is 28 years old has a 2015 felony conviction in California for possession for sale of a controlled substance (California Health and Safety Code 1351 HS).

48. I also researched the sender names listed on the 46 images of parcels mentioned in paragraphs 34 and 35 above. Ten of the parcels were supposedly sent by "D&G Graphic Tee's" and gave the Fallston, NC PO Box mentioned in paragraph 44 above as the return address. Nine of those ten parcels were mailed at Steele Creek Station Post Office in Charlotte, NC. One was mailed from a Post Office in Mount Holly, NC.

49. On January 9, 2019, three Flat Rate Priority Mail parcels were mailed from the Charlotte/Kannapolis area to addresses in the San Jose, CA area involved in the

investigation. The first two parcels were accepted at the Steele Creek Station Post Office in Charlotte, NC. The third was accepted at the Post Office in Landis, NC. All three were cash transactions.

50. The first parcel (tracking # 9505514155279009322794) was addressed to “Sabine Moraga” and states that it is from “D&G Graphic Tee’s” at the aforementioned Fallston, NC PO Box. Research shows that the delivery address in the San Jose, CA area is associated with M. THALLER and S. THALLER, and is the address given for them on deed instruments, described above, recorded with the Cabarrus County Register of Deeds. The delivery address is not associated with anyone named “Sabine Moraga”.

51. The second parcel (tracking # 9505514155279009322800) was addressed to “Michael Pomposo” and also states that it is from “D&G Graphic Tee’s” at the Fallston, NC PO Box. Research shows that the delivery address in the San Jose, CA area is associated with S. THALLER. The delivery address is not associated with anyone named “Michael Pomposo”.

52. The third parcel (tracking # 9505516160129009251975) was addressed to “Joseph Maria” and states that it is from “Michael Brooks” at an address in China Grove, NC. Research showed that the delivery address the San Jose, CA area is associated with PSICK, whose mother’s surname is “Maria”. The delivery address is not associated with anyone named “Joseph Maria”. There is no “Michael Brooks” associated with the return address in China Grove, NC.

53. On January 10, 2019, and January 11, 2019, USPS-OIG agents recovered the three parcels (tracking #s 9505514155279009322794, 9505514155279009322800, and

9505516160129009251975) at the San Jose, CA, Processing and Distribution Center. The parcels were sent to the USPS-OIG's Greensboro, NC, office by Registered Mail.

54. On February 21, 2019, the first parcel (tracking # 9505514155279009322794) was searched pursuant to a search and seizure warrant issued on February 19, 2019, in the Middle District of North Carolina by Magistrate Judge Peake [1:19MJ63]. The parcel contained three boxes of Little Debbie Honey Buns. In addition to Honey Buns, each box contained a vacuum-sealed food saver bag containing a bundle of U.S. currency. The total value of the currency in this parcel was \$40,200.00.

55. On February 21, 2019, the second parcel (tracking # 9505514155279009322800) was searched pursuant to a search and seizure warrant issued on February 19, 2019, in the Middle District of North Carolina by Magistrate Judge Peake [1:19MJ64]. This parcel also contained three boxes of Little Debbie Honey Buns. In addition to Honey Buns, each box contained a vacuum-sealed food saver bag containing a bundle of U.S. currency. The total value of the currency in this parcel was \$40,080.00.

56. On February 21, 2019, the third parcel (tracking # 9505516160129009251975) was searched pursuant to a search and seizure warrant issued on February 19, 2019, in the Middle District of North Carolina by Magistrate Judge Peake [1:19MJ65]. The parcel contained three boxes that were packaging for children's toys. There were no toys in the boxes. Each box contained a bundle of U.S. currency wrapped in multiple layers of vacuum-sealed food saver bags. The total value of the currency in this parcel was \$40,344.00.

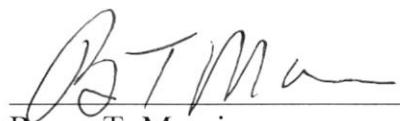
57. The combined value of the currency in the three parcels was \$120,624.00.

Conclusion

58. Based on the foregoing, your declarant maintains there is probable cause to believe that a total of the \$120,624.00 in U.S. Currency (consisting of three amounts: \$40,200.00, \$40,080.00, and \$40,344.00) was furnished or intended to be furnished in exchange for a controlled substance or represents proceeds traceable to such an exchange, and is therefore subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 981(a)(1)(C).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

This the 15th day of April, 2019.



Roger T. Marvin
Special Agent
US Postal Service – Office of Inspector General